

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : CHAPTER 13
Joann Ferrer :
Debtor : BANKRUPTCY NO.: 17-10306-JFK

REPLY TO PATRICK FUNG'S MOTION FOR RELIEF

Debtor, by her attorney, Brandon Perloff, Esq. by way of answer to Movant's motion, respectfully represents the following:

1. Admitted.

2. Admitted

3.- 4. Pursuant to Bankruptcy Rule 9017 and Fed R. Evid. 1002, the Debtor objects to the characterization and description of the contents of a writing, which has not been made a part of the record. The contents of such a writing must be proven by the original document. Therefore, these averments are denied.

5. Denied. The Landlord has received the referenced monies paid by the Debtor herself or paid on her behalf.

6. Denied. The allegations contained in this paragraph constitute legal conclusions to which no response is required. By way of further response, the Debtor has paid the Landlord post-petition rent and proof of such payments will be provided at the hearing.

7.-8. Denied. The allegations contained in this paragraph constitute legal conclusions to which no response is required.

WHEREFORE, Debtor prays that the Movant's request for relief be denied.

Respectfully submitted,

Date: 3/4/2017

/s/ Brandon Perloff
Brandon Perloff, Esquire.
Attorney for Debtor